EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

## **Section 1. Registration Information**

#### Source Identification

Facility Name: Enterprise Flagstaff (Winona) Terminal Parent Company #1 Name: Enterprise Products Operating, LLC

Parent Company #2 Name:

## Submission and Acceptance

Submission Type: Re-submission

Subsequent RMP Submission Reason: Voluntary update (not described by any of the above

reasons)

Description: 2007 Enterprise Re-submission

 Receipt Date:
 30-Nov-2011

 Postmark Date:
 30-Nov-2011

 Next Due Date:
 30-Nov-2016

 Completeness Check Date:
 30-Nov-2011

Complete RMP: Yes

De-Registration / Closed Reason:

De-Registration / Closed Reason Other Text:

De-Registered / Closed Date:

De-Registered / Closed Effective Date:

Certification Received: Yes

## **Facility Identification**

EPA Facility Identifier: 1000 0017 0879

Other EPA Systems Facility ID:

#### **Dun and Bradstreet Numbers (DUNS)**

Facility DUNS:

Parent Company #1 DUNS: 841528859

Parent Company #2 DUNS:

### **Facility Location Address**

Street 1: 13625 Townsend Winona Highway

Street 2:

City: Flagstaff
State: ARIZONA
ZIP: 86004

ZIP4:

County: COCONINO

### Facility Latitude and Longitude

Latitude (decimal): 35.204778

Longitude (decimal): -111.406111

Lat/Long Method: GPS - Unspecified

Lat/Long Description: Administrative Building

Horizontal Accuracy Measure: 50

Horizontal Reference Datum Name: World Geodetic System of 1984

Source Map Scale Number:

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

Owner or Operator

Operator Name: Enterprise Products Operating, LLC

Operator Phone: (713) 381-6500

Mailing Address

Operator Street 1: P. O. Box 4324

Operator Street 2:

Operator City: Houston
Operator State: TEXAS
Operator ZIP: 77210
Operator ZIP4: 4324

Operator Foreign State or Province:

Operator Foreign ZIP: Operator Foreign Country:

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person: Alfred J. Wussler

RMP Title of Person or Position: Senior Compliance Engineer - RMP

RMP E-mail Address: Awussler@eprod.com

**Emergency Contact** 

Emergency Contact Name: Robert Shimel
Emergency Contact Title: Terminal Operator
Emergency Contact Phone: (928) 526-5328
Emergency Contact 24-Hour Phone: (928) 863-8690

Emergency Contact Ext. or PIN:

Emergency Contact E-mail Address: RRShimel@eprod.com

Other Points of Contact

Facility or Parent Company E-mail Address:

Facility Public Contact Phone:

Facility or Parent Company WWW Homepage

Address:

www.enterpriseproducts.com

Local Emergency Planning Committee

LEPC: Coconino County LEPC

1

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:

FTE Claimed as CBI:

Covered By

OSHA PSM: Yes

EPCRA 302 : CAA Title V:

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

Air Operating Permit ID:

#### **OSHA** Ranking

OSHA Star or Merit Ranking:

## Last Safety Inspection

Last Safety Inspection (By an External Agency)

Date:

Last Safety Inspection Performed By an External

Agency:

14-Apr-2010

U. S. Dept. of Transportation - Fed. Rlwy Admin.

#### **Predictive Filing**

Did this RMP involve predictive filing?:

### **Preparer Information**

Preparer Name:

Preparer Phone:

Preparer Street 1:

Preparer Street 2:

Preparer City:

Preparer State:

Preparer ZIP:

Preparer ZIP4:

Preparer Foreign State:

Preparer Foreign Country:

Preparer Foreign ZIP:

## Confidential Business Information (CBI)

CBI Claimed:

Substantiation Provided:

Unsanitized RMP Provided:

#### Reportable Accidents

Reportable Accidents:

See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

#### **Process Chemicals**

Process ID: 1000030074

Description: Propane Storage & Loading

Process Chemical ID: 1000036162

Program Level: Program Level 3 process

Chemical Name: Propane
CAS Number: 74-98-6
Quantity (lbs): 710000

CBI Claimed:

Flammable/Toxic: Flammable

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

## **Process NAICS**

Process ID: 1000030074
Process NAICS ID: 1000030398

Program Level: Program Level 3 process

NAICS Code: 42471

NAICS Description: Petroleum Bulk Stations and Terminals

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

## **Section 2. Toxics: Worst Case**

No records found.

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

## **Section 3. Toxics: Alternative Release**

No records found.

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

## **Section 4. Flammables: Worst Case**

Flammable Worst ID: 1000018157

Model Used:

EPA's RMP\*Comp(TM)

Endpoint used:

1 PSI

**Passive Mitigation Considered** 

Blast Walls: Other Type:

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

## Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000016978

Model Used: EPA's RMP\*Comp(TM)

Passive Mitigation Considered

Dikes:

Fire Walls:

Blast Walls:

Enclosures:

Other Type:

**Active Mitigation Considered** 

Sprinkler System:

Deluge System:

Water Curtain:

**Excess Flow Valve:** 

Other Type: Emergency shutdown system

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

# **Section 6. Accident History**

No records found.

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

## Section 7. Program Level 3

## Description

The proximity of the rail car unloading operations and the propane storage and truck loading has resulted in the two operations being considered as one process. Enterprise has implemented a full 14-point safety management program designed to be compliant with the requirements of the OSHA Process Safety Management Standard and the EPA RMP Rule. The safety management program in use at the Winona Terminal is described more fully in the Executive Summary.

## Program Level 3 Prevention Program Chemicals

1000031046 Prevention Program Chemical ID: Chemical Name: Propane Flammable/Toxic: Flammable CAS Number: 74-98-6

Prevention Program Level 3 ID: 1000026023 NAICS Code: 42471

#### Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):

19-May-2009

### Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):

27-Oct-2008

## The Technique Used

What If:

Checklist: Yes

What If/Checklist:

HAZOP: Yes

Failure Mode and Effects Analysis:

Fault Tree Analysis: Other Technique Used:

PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):

30-Sep-2012

#### Major Hazards Identified

Toxic Release:

Fire: Yes Explosion: Yes

Runaway Reaction: Polymerization:

Overpressurization: Yes

Corrosion:

Overfilling: Yes

Contamination:

**Equipment Failure:** Yes Facility Name: Enterprise Flagstaff (Winona) Terminal

EPA Facility Identifier: 1000 0017 0879

Plan Sequence Number: 1000024568

Loss of Cooling, Heating, Electricity, Instrument Air:

Yes

Earthquake: Floods (Flood Plain):

Tornado: Hurricanes:

Other Major Hazard Identified:

## Process Controls in Use

Vents:YesRelief Valves:YesCheck Valves:Yes

Scrubbers: Flares:

Manual Shutoffs: Yes
Automatic Shutoffs: Yes
Interlocks: Yes
Alarms and Procedures: Yes

Keyed Bypass:

Emergency Air Supply: Emergency Power: Backup Pump:

Grounding Equipment: Yes

Inhibitor Addition: Rupture Disks:

Excess Flow Device: Yes

Quench System: Purge System:

None:

Other Process Control in Use: Terminal ESD System

### Mitigation Systems in Use

Sprinkler System:

Dikes:
Fire Walls:
Blast Walls:
Deluge System:
Water Curtain:
Enclosure:
Neutralization:

None: Yes

Other Mitigation System in Use:

## Monitoring/Detection Systems in Use

Process Area Detectors: Perimeter Monitors:

None:

Other Monitoring/Detection System in Use:

Loading area fire automatic shutoff system

## Changes Since Last PHA Update

Reduction in Chemical Inventory: Increase in Chemical Inventory:

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

Change Process Parameters:

Installation of Process Controls:

Installation of Process Detection Systems: Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended:

None:

Other Changes Since Last PHA or PHA Update:

Battery backup for emergency lighting system

### **Review of Operating Procedures**

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):

19-May-2011

#### **Training**

Training Revision Date (The date of the most recent 19-May-2009 review or revision of training programs):

#### The Type of Training Provided

Classroom: Yes On the Job: Yes

Other Training: Computer based training (CBT), Job Shadowing;

Safety meeting conference calls

## The Type of Competency Testing Used

Written Tests:

Yes

Oral Tests:
Demonstration:
Observation:

Other Type of Competency Testing Used:

#### Maintenance

Maintenance Procedures Revision Date (The date of 19-May-2009 the most recent review or revision of maintenance procedures):

Equipment Inspection Date (The date of the most recent equipment inspection or test):

13-Oct-2011

Equipment Tested (Equipment most recently inspected or tested):

Hydrostatic test of loading hoses

#### Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):

24-Aug-2011

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

Change Management Revision Date (The date of the most recent review or revision of management of

19-May-2009

change procedures):

## **Pre-Startup Review**

Pre-Startup Review Date (The date of the most recent pre-startup review):

### **Compliance Audits**

Compliance Audit Date (The date of the most recent 19-May-2009 compliance audit):

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):

19-May-2012

#### Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

## **Employee Participation Plans**

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):

19-May-2009

### Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most 16-Dec-2010 recent review or revision of hot work permit procedures):

### Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):

19-May-2009

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

26-Oct-2011

#### **Confidential Business Information**

**CBI Claimed:** 

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

# **Section 8. Program Level 2**

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

## **Section 9. Emergency Response**

## Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):

Facility Plan (Does facility have its own written emergency response plan?):

Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Yes

Healthcare (Does facility's ER plan include information on emergency health care?):

Yes

### **Emergency Response Review**

Review Date (Date of most recent review or update 31-Jan-2011 of facility's ER plan):

#### **Emergency Response Training**

Training Date (Date of most recent review or update 30-Mar-2010 of facility's employees):

#### **Local Agency**

Agency Name (Name of local agency with which the Summit Fire District facility ER plan or response activities are coordinated):

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):

(928) 526-9537

## Subject to

OSHA Regulations at 29 CFR 1910.38: Yes
OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws:

Yes

Other (Specify):

EPA Facility Identifier: 1000 0017 0879 Plan Sequence Number: 1000024568

## **Executive Summary**

Winona Propane Terminal
Enterprise Products Operating LLC
Executive Summary
Risk Management Plan

EPA Identifier: 1000 0017 0879

#### Accidental Release Prevention and Response

Enterprise Products has a long-standing commitment to worker and public safety. This commitment is demonstrated by the resources invested in accident prevention, such as training personnel and considering safety in the design, installation, operation and maintenance of the facility's processes. It is the practice of Enterprise Products Operating LLC (Enterprise) to implement reasonable controls to prevent foreseeable releases of substances. However, if a release does occur, trained personnel will respond to, control and contain the release.

Description of the Stationary Source and Regulated Substances

The Winona propane terminal located in Coconino County, Arizona is owned by Enterprise Products Operating, LLC, and is operated by Enterprise.

The Winona Propane terminal facility is a bulk hydrocarbon storage and handling facility. The facility receives odorized propane LPG by rail car and stores the liquid in one of three above ground pressurized storage tanks. A propane vapor compressor is used to provide pressurized vapors into the vapor space for the unloading of rail cars spotted on the facility rail siding. The same compressor is subsequently used to remove vapors from the empty cars prior to their disconnection from the tank fill piping and railcar unloading racks. Odorized propane stored in the three above-ground propane storage bullets is transferred to 18-wheel propane tanker trucks through the use of a small liquid propane pump. The terminal operator is responsible for the hookup, unloading and disconnection of supply rail cars. The operator also assists with the proper tare weighing, loading and full weighing of transport trucks that fill up at the terminal, and with coordinating the removal of empty rail cars and the delivery of full cars as the propane transfer demand requires.

The Winona Propane Terminal facility was evaluated to determine if any regulated flammable or toxic substances exceeded the threshold quantity. Enterprise identified the regulated substances and quantities kept on site based on the known volumes of the storage tanks and supply rail cars. The only listed flammable substance which is stored above the threshold quantity at the Winona Propane Terminal facility is odorized propane. The propane terminal facility is subject to the Occupational Safety and Health Administration (OSHA) Process Safety Management (PSM) Standard and is classified as a Program Level 3 site under the EPA RMP program.

#### Offsite Consequence Analysis Results

The offsite consequence analysis will not be reflected in the executive summary but rather is reflected in the data components. There are flammable substances on site and no toxic substances above the threshold quantity.

#### General Accident Release Prevention Program

The following is a summary of the accident prevention program being put in place at the Winona propane terminal. The storage and loading operations at the propane terminal facility are regulated by the Environmental Protection Agency (EPA) Risk Management Program (RMP) regulation, and are also subject to the OSHA PSM standard. This summary addresses each of the PSM program elements and describes the management system in place to implement the accident prevention program.

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#### **Employee Participation**

Active employee participation and involvement in the development and implementation of the terminal facility's PSM program is an important step toward achieving the objective to prevent or minimize the consequences of catastrophic releases of flammable or explosive chemicals. Employee involvement helps to ensure that all perspectives regarding PSM compliance and accident prevention are considered and that the best ideas are implemented. Open communications are encouraged between supervisors and employees regarding all aspects of safety and health issues concerning the employees and the public.

Enterprise strongly promotes employee involvement in safety issues through existing programs. These programs include regularly scheduled safety meeting, tail-gate safety meetings, hazard communications, Safety Suggestion Forms, a "near-miss" reporting system and special training programs such as emergency response training, first aid training, etc.

Enterprise actively seeks employee involvement in the development and conduct of all accident prevention activities through the appropriate existing safety programs. Accident prevention is discussed at the regularly scheduled safety meetings and/or during special training sessions if necessary. Employees are encouraged to discuss accident prevention with their supervisors and to bring any questions, comments or suggestions forward for open discussion.

#### **Process Safety Information**

Complete and accurate written process safety information concerning process chemicals, process technology and process equipment is essential to an effective PSM and RMP program as well as completing and maintaining a process hazard analysis. The process safety information will be useful to the operator, the team performing a process hazard analysis and those in charge of updating the emergency preparedness plans. Enterprise has developed a variety of technical documents that will be used to help maintain a safe operating process, including an accurate set of process and instrument diagrams for the terminal. These documents address chemical properties and associated hazards, limits for key process parameters, specific chemicals inventories and equipment design basis/configuration information.

Chemical specific information, including exposure hazards and emergency response/exposure treatment considerations is provided in material safety data sheets (MSDS).

Enterprise also maintains numerous technical documents that provide information about the design and construction of process equipment. This information includes materials of construction, design pressure ratings, temperature ratings and electrical rating of equipment. This information in combination with written procedures and trained personnel provides a basis for establishing inspection and maintenance activities, as well as for evaluating proposed process and facility changes to ensure that safety features in the process are not compromised.

#### Process Hazard Analysis (PHA)

The Winona propane terminal has a comprehensive program to help ensure that hazards associated with the various processes are identified and controlled. Within this program, the facility is systematically examined to identify hazards and ensure that adequate controls are in place to manage these hazards. The results of any previous process hazard analyses conducted by the previous owner are not available at the terminal.

Enterprise primarily uses the hazard and operability (HAZOP) and Checklist method analysis technique to perform these evaluations. The analyses are conducted using a team of Enterprise staff which has operating and maintenance experience as well as engineering expertise. This team identifies and evaluates hazards of the process as well as accident prevention and mitigation measures, and the team makes suggestions for additional prevention and/or mitigation measures when the team believes such measures are necessary.

The PHA team findings are forwarded to local and corporate management for resolution. Implementation of mitigation options in response to PHA findings is based on a relative risk ranking assigned by the PHA team. This ranking helps ensure that potential accident scenarios assigned the highest risk receive immediate attention. All approved mitigation options in response to PHA team findings are tracked until they are completed. The final resolution of each finding is documented and retained.

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To help ensure that the process controls and/or process hazards do not eventually deviate significantly from the original design safety features, the propane terminal facility periodically updates and revalidates the hazard analysis results. These periodic reviews are conducted at least every five years and will be conducted at this frequency until the process is no longer operating. The results and findings from these updates are documented and retained. Once again, the responses to the team findings are also documented and retained.

#### **Operating Procedures**

The Winona propane terminal maintains written procedures that address various modes of process operations such as; (1) start-up, (2) normal operations, (3) temporary operations, (4) emergency shutdown, (5) normal shutdown and (6) initial startup of a new process. These procedures provide guidance for experienced operators and also provide the basis for training new operators. Operating procedures are periodically reviewed and annually certified as current and accurate. The review and certification process involves both operators and technical staff.

The intent of the operating procedures is to provide workable, useful and clearly written instructions for conducting operating activities. To have effective operating procedures, the task and procedures directly and indirectly related to the covered process must be appropriate, clear, consistent and most importantly communicated to employees. Operating procedures are specific instructions or details on what steps are taken or followed in carrying out the stated procedures. The specific instructions include the applicable safety precautions and appropriate information on safety implications.

#### Training

In addition to training on operating procedures, the Winona propane terminal has a comprehensive training program for all employees involved in operating the facility. New employees receive basic training in equipment and process flows, tank car unloading, and LPG truck loading operations. In addition, all operators periodically receive refresher training on the operating procedures to ensure that their skills and knowledge are maintained at an acceptable level. This refresher training is conducted at lease every three years. All of this training is documented for each operator including the means to verify that the operator understood the training.

#### Contractors

The Winona propane terminal uses contractors during periods of increased maintenance or construction activities. Because some contractors work on or near process equipment, the propane terminal facility has procedures in place to ensure that contractors (1) perform their work in a safe manner, (2) have appropriate knowledge and skills, (3) are aware of the hazards of their workplace, (4) understand what they should do in the event of an emergency, (5) understand and follow site specific safety rules and (6) inform propane terminal facility personnel of any hazards that they find while performing their work. This is accomplished by providing contractors with an orientation session that covers (1) a process overview, (2) information about the safety and health hazards, (3) emergency response plan requirements and (4) safe work practices prior to beginning their work. In addition, the Winona propane terminal facility evaluates contractor safety programs and performance during the contractor selection process. Enterprise personnel will periodically monitor contractor performance to ensure that contractors are fulfilling their safety obligations.

#### Pre-Startup Safety Review (PSSR)

The Winona propane terminal facility conducts a PSSR on any new facility or facility modification that requires a change in process safety information. The purpose of the PSSR is to ensure that safety features, procedures, personnel and equipment are appropriately prepared for startup prior to placing the equipment into service. This review provides one additional check to make sure construction is in accordance with design specifications and that all supporting systems are operationally ready. The PSSR involves field verification of the construction and serves a quality assurance function by requiring verification that accident prevention program requirements are properly implemented.

#### Mechanical Integrity

The Winona propane terminal is implementing practices and procedures for maintaining process equipment. The basic aspects of

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this program include (1) training, (2) developing written procedures, (3) performing inspections and tests, (4) correcting equipment deficiencies, when identified and (5) applying quality assurance measures. In combination, these activities form a system that maintains the mechanical integrity of the process.

Enterprise incorporates quality assurance measures into equipment purchases and repairs. This helps ensure that new equipment is suitable for its intended use and that proper materials and spare parts are used when repairs are made.

#### Safe Work Practices

The Winona propane terminal has long standing safe work practices in place to help ensure worker and process safety. Examples of these include: (1) control of the entry/presence/exit of support personnel, (2) a lockout/tagout procedure to ensure isolation of energy sources for equipment undergoing maintenance, (3) a procedure for safe removal of hazardous substances before process piping and equipment is opened, (4) a permit and procedure to control spark-producing activities (i.e., hot work) and (5) a permit and procedure to ensure that adequate precautions are in place before entry into a confined space. These procedures, along with training of affected personnel, form a system to help ensure that operations and maintenance activities are performed safely

#### Management of Change

The Winona propane terminal has a comprehensive system to manage change to all covered processes. This system requires that changes to items such as process equipment, technology (including process operating conditions), procedures and other facility changes be properly reviewed and authorized before being implemented. Changes are reviewed to ensure that adequate controls are in place to manage any new hazards and to verify that existing controls have not been compromised by the change. Affected chemical hazard information, process operating limits and equipment information, as well as procedures, are updated to incorporate these changes. In addition, operating and maintenance personnel are provided any necessary training on the changes.

#### Incident Investigation

The Winona propane terminal promptly investigates all incidents that resulted in or reasonably could have resulted in, a fire/explosion, major property damage, environmental loss, or personal injury. The goal of each investigation is to gather the facts, determine the root cause, and develop corrective action to prevent the reoccurrence of the incident or a similar incident. The investigation team documents its findings, develops recommendation(s) to prevent a reoccurrence and forwards these results to the business management team for resolution.

#### Compliance Audits

To help ensure that the accident prevention program is functioning properly, Enterprise periodically conducts an audit to determine whether the procedures and practices required by the accident prevention program are being implemented. Compliance audits are conducted at least every three years. Both hourly and staff personnel participate as audit team members. The audit team develops findings that are forwarded to propane terminal facility management for resolution. Corrective actions taken in response to the audit team's findings are tracked until they are resolved and completed. The final resolution of each finding is documented, and the two most recent audit reports are retained.

#### **Chemical Specific Prevention Steps**

The processes at the Winona propane terminal have hazards that must be managed to ensure continued safe operation. The following is a description of existing safety features applicable to prevention of accidental releases of regulated substances in the facility.

#### Universal Prevention Activities

The accident prevention program summarized previously is applied to all RMP covered processes at the Winona Propane terminal. Collectively, these prevention program activities help prevent potential accident scenarios that could be caused by equipment failures and human errors.

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#### Specialized Safety Features

The Winona Propane Terminal has safety features on the facility equipment to help contain/control a release, to quickly detect a release and reduce the consequence of a release. The following types of safety features are used in the covered processes:

#### Release Containment and Control

- \* Valves to permit isolation of the process (manual or automated).
- \* Automatic shutdown systems for specific process parameters (e.g., high flow).
- \* Redundant equipment and instrumentation (e.g., excess flow shutdown, backed up by a technician activated ESD system.).
- \* Atmospheric manual vents and automatic relief devices.
- \* An operator initiated emergency shutdown system

#### Release Mitigation

- \* Hand-held fire extinguishers
- \* Personnel trained in emergency response and procedures.
- \* Personnel protective equipment (e.g., chemical protective clothing, hard hats, flame retardent coveralls, safety glasses, etc.)
- \*An automtic loading fire detection and shutdown system.

#### Five Year Accident History

The Winona Propane terminal has an excellent record of accident prevention. Over the past five years there have been no large or small releases with injuries or offsite consequences.

#### **Emergency Procedures Information**

The Winona propane terminal currently utilizes a set of written emergency procedures, which are in place to protect worker and public safety as well as the environment. The procedures are for the possibility of a fire or explosion if a flammable substance is accidentally released. The procedures address notification of local emergency response agencies if a release occurs. Employees receive training in the emergency procedures, and they are updated when necessary based on modifications made to the propane terminal facility.

The overall emergency procedure program for Winona propane terminal is coordinated with the Coconino County Local Emergency Planning Committee (LEPC). This coordination will include periodic meetings with the committee, which includes local emergency response officials, local government officials and industry representatives. The Winona propane terminal will institute any necessary around-the-clock communications capability with appropriate LEPC officials similar to those already in place for contacting the local fire department. This will provide a means of notifying the public of an incident, if necessary, as well as facilitating quick response to an incident. In addition to the planned periodic LEPC meetings, the Winona propane terminal conducts periodic reviews of emergency procedures with the fire department emergency response organization. The Winona propane terminal facility also currently holds periodic meetings with local emergency responders regarding the hazards of the regulated substances handled by the propane terminal facility and the location of emergency shutoffs and equipment.

#### Planned Changes to Improve Safety

The Winona Propane terminal facility resolves all findings from PHA's, some of which result in modifications to the process. Changes are usually planned in response to PHA's, safety audits and incident investigation findings. The following change to improve the safety at the location is planned for implementation in the near future, prior to the conduct of the PHA revalidation.

\* Enterprise is in the process of reviewing the entire 14-issue safety management/accident prevention program to ensure that it can be effectively implemented across the wide variety of covered facilities operated by Enterprise.